DECODING THE SCHOOL NUTRITION PROGRAMS

ASBO April 25, 2017



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Agenda

Preparation for the Administrative Review

- School Nutrition101 for BusinessManagers
- USDA Foods (Commodities)Maximizing Federal Funds
- Hot Topics

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PREPARING FOR A SCHOOL FOOD SERVICE REVIEW

The Administrative Review

AR Reinvention Goals

- The Healthy Hunger-Free Kids Act of 2010 called for a more effective and efficient review process
- Consolidated the review process
- Incorporated school breakfast, the new meal pattern, and dietary specifications, and the performance-based reimbursement
- Implement a 3-year review cycle

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Why Is There a Review?

- To Ensure Program Integrity and Proper Use of Federal Funding
- A Check for SFA Compliance with Regulations

Areas of Review

Critical Areas

Performance Standard 1

- Student Eligibility
- Meal Counts
- Reimbursement

Performance Standard 2

- Meal Pattern & Components
- Dietary Specifications

General Areas

- Resource Management
 - Financial
- General Program Compliance
 - Civil Rights, Food Safety, Smart Snacks, Professional Standards, etc.
- Other Federal Programs
 - After School Snack
 - Special Milk Program
 - FFVP

The Administrative Review Process

Off-Site Assessment Tool

Evaluation Questions

On-Site Review

Validation Questions

Post On-Site Follow Up

Review Close

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Administrative Review Structure				
Access & Reimbursement	Nutritional Quality/ Meal Pattern	Resource Management	General Program Compliance	Other Federal Program Reviews
Eligibility Determination	Meal Components	Nonprofit School Food Service Acct	Civil Rights	Afterschool Snack
Benefit Issuance	Offer versus Serve	Paid Lunch Equity	SFA On-site Monitoring	Seamless Summer Option
	Dietary Specifications & Nutrient Analysis	Revenue from Non-program Foods	Local Wellness Policy	Fresh Fruit and Vegetable Program
Verification		Indirect Costs	Competitive Foods/Smart Snacks	Special Milk Program
Meal Counting			Professional Standards	Special Provision 2, 3, & CEP

Food Safety, Storage, &

Buy American Reporting & Recordkeeping SBP & SSO Outreach

Preparation IS KEY

Claiming Reimbursement



- Conduct a meeting with your staff to help them understand their role in the review and begin preparations!
- Admin Review has 3 parts:
 - Pre Visit Procedures: Business Office & Food Service
 - On-site Visit Review: Business Office, Food Service, & Others involved in program requirements
 - Follow-up and Close: Business Office & Food Service

Pre-Visit Procedures: Completed by CANS

- Notify the Authorized Representative and Food Service Director:
 You are on the list this school year!
- Send the SFA the Off-Site Assessment document
- Review the completed Off-Site Assessment document and clarify questions
- Nail down some pre-visit information:
 - Who will be involved, specifics on the SFA's program
- Select sites for review
- Schedule an on-site visit date

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How You Can Prepare for the Admin Review

Meal Access and Reimbursement Performance Standard (PS) 1

- Certification and Benefit Issuance
 - Review SFA eligibility documentation and student eligibility roster
- Verification
 - Review your verified applications and process

How You Can Prepare for the Admin Review

Meal Access and Reimbursement PS 1

- Meal Counting & Claiming watch your meal counts!
 - Is someone ALWAYS stationed at the point of service meal count station?
 - Do meal count staff monitor meals for completeness and count only eligible student meals?
 - Do meal count staff properly charge a la cart prices?
 - Does your meal count method protect confidentiality of student meal benefits?
 - Are monthly edit checks completed to ensure claim accuracy?

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How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

- Meal Components and Quantities
 - Watch meal service.
 - Are all the required meal components offered to all students?
 - Are staff properly telling students what they can and cannot take?
 - What happens when a food runs out?
 - What happens when a student refuses a reimbursable meal?
 Does the school charge for meals that are not reimbursable meals?

How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

- Offer versus Serve (OVS)
 - What is your OVS selection in your iCAN Site Application?
 - Watch meal service
 - Do staff understand the minimum component requirements?
 - Do staff know the difference between a complete (reimbursable) meal and a la carte or seconds purchase and how to charge accordingly?
 - Is signage posted for students to understand meal requirements?
 - Do staff accurately judge food quantities when food is self serve?

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How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

- Dietary Specifications and Nutrient Analysis
 - Are daily Production Records made?
 - Are all the components on the Production Records filled out?
 - Does the menu planner understand how to record a meal on the production record
 - Does the menu planner ensure that average calories, saturated fat, and sodium requirements are met; do they check labels for zero trans fat?
 - Are they asking for American agricultural products? Do they collect documentation from the vendor/manufacturer for food grown/processed outside of the US?

How You Can Prepare for the Admin Review

Resource Management

- Nonprofit Food Service Account
 - Do your reimbursements go into a dedicated foodservice account?
 - Do you have a method to verify only allowable costs are charged to this account?
- Paid Lunch Equity (PLE)
 - Is the PLE tool completed and student paid prices set properly or a source of nonfederal funding found to supplement PLE requirements?

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How You Can Prepare for the Admin Review

Resource Management

- Revenue from NonProgram Foods
 - Adult meals, purchased seconds, a la cart, other foods purchased using FS dollars.
 - Is the USDA Non Program Tool completed and results are compliant?
- Indirect Costs
 - Are indirect costs charged to the FS account? Do you have approval from both a Cognizant agency and from CANS? Are indirect costs equitably charged to all federal programs?

How You Can Prepare for the Admin Review

General Program Compliance

- Civil rights
 - Is the "And Justice For All" poster in the meal service area?
 - Did staff receive <u>ANNUAL</u> Child Nutrition Civil Rights training? This
 is different than the Title Civil Rights training.
 - Do all students have equal access to your meal program?
 - Do your program materials and website contain the nondiscrimination statement?
 - Check how your school handles complaints of civil rights discrimination within the school meal program. Is it a written or informal policy that meets requirements in <u>CANS NSLP memo</u> 108?

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How You Can Prepare for the Admin Review

General Program Compliance

- Onsite Monitoring (required for SFAs with more than 1 feeding site)
 - Has monitoring been completed for each school/feeding site prior to Feb 1?
 - Are the results recorded on the Onsite Monitoring Worksheet?
- Local School Wellness Policy
 - Does it meet the final requirements?
 - TIP: Use the Wellness Policy Self-Checklist

Wellness Policy – Final Rule July 1, 2017

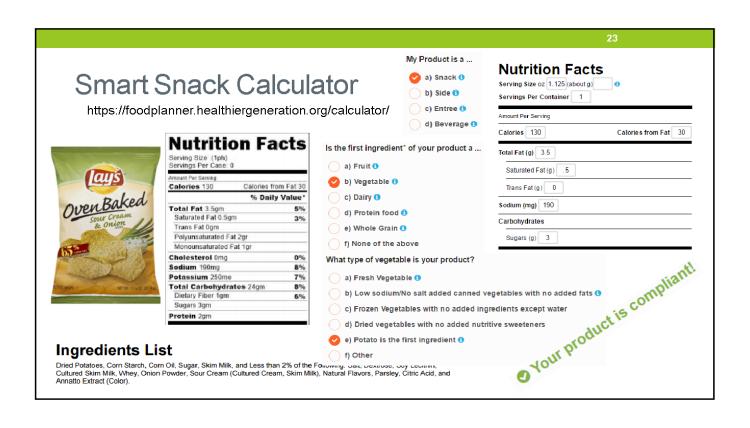
- Permit parents, students, other school staff, general public to participate in reviewing and updating policy
- Identify a wellness leader to enforce compliance within district
- Inform and update the public on content of policy updates
- Include required components:
 - Goals for nutrition promotion, PE, other school wellness activities.
 - Guidelines for all foods sold in schools meals and smart snacks
 - Policy for food and beverages available in schools parties, incentives, fundraisers
 - · Food and beverage marketing policy
 - Description of public involvement, updates, leadership and evaluation plan.

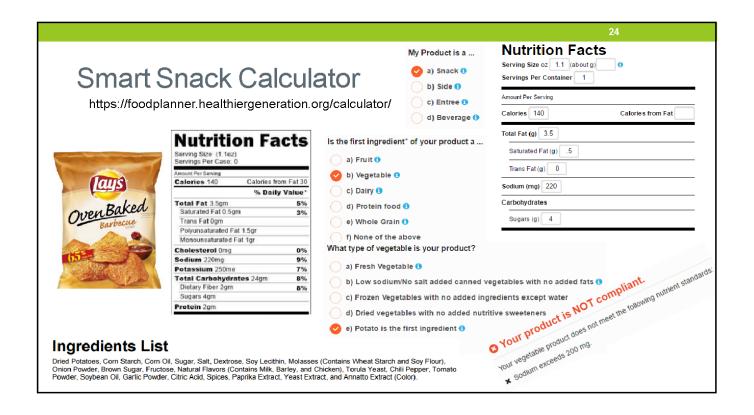
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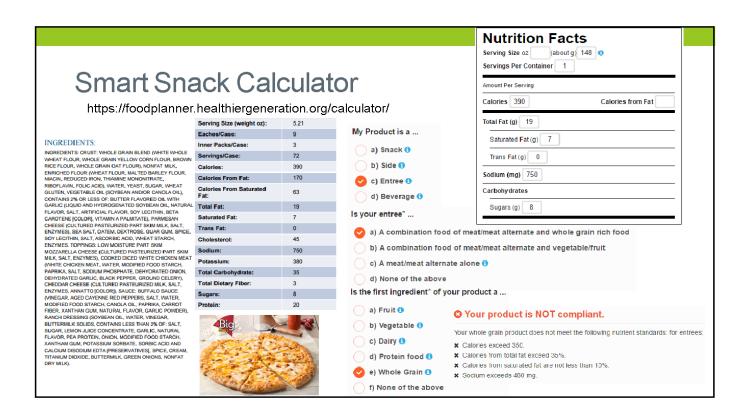
How You Can Prepare for the Admin Review

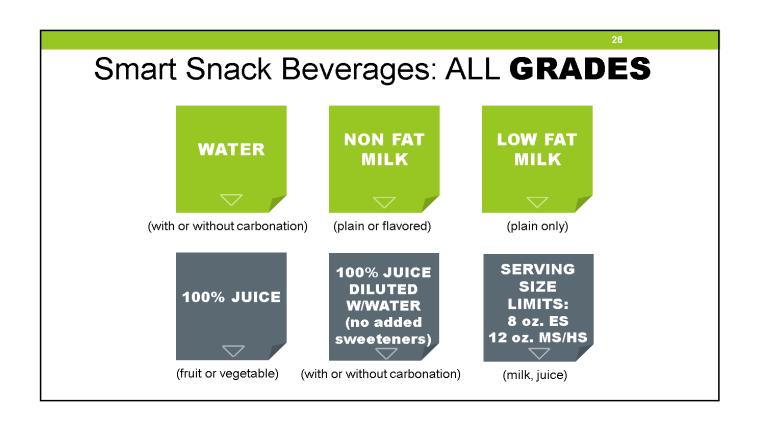
General Program Compliance

- Smart Snacks
 - Applies to all food sold to students during school day outside of reimbursable meal
 - Ensure all foods sold during school day are Smart Snack compliant
 - A la Carte
 - Vending Machines
 - Exempt Fundraisers









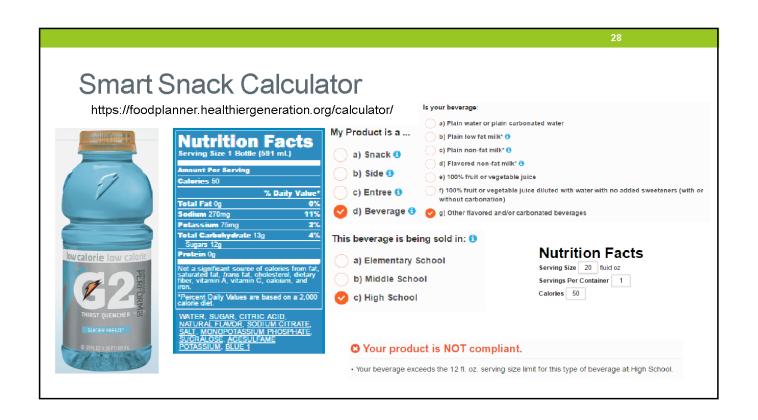
Smart Snack Beverages: High School ONLY

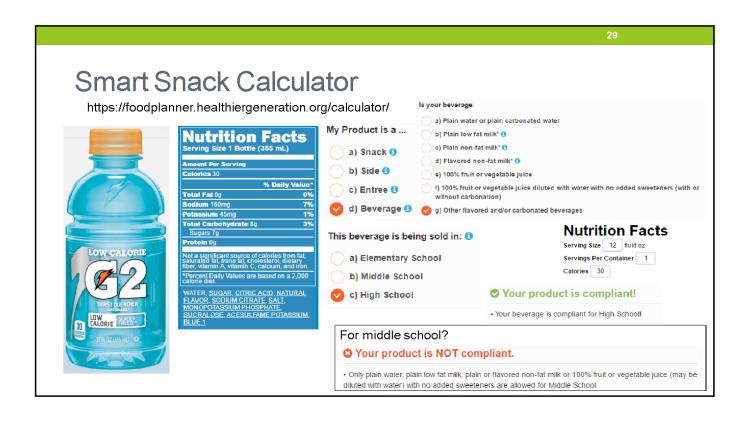
DIET BEVERAGES (20 oz.)

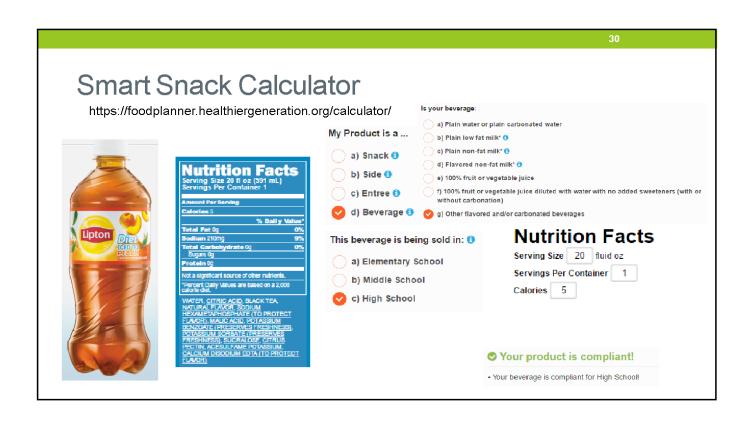
(<5 kcal/8 oz. OR ≤10 kcal/20 oz.)

LOW-CALORIE BEVERAGES (12 oz.)

(≤40 kcal/8 oz. OR ≤60 kcal/12 oz.)







How You Can Prepare for the Admin Review

General Program Compliance

- Professional Standards
 - Every school must have at least one "Food Service Director"
 - Do all staff have the appropriate minimum number of training hours?
 - Are they recorded?
 - Food Service Director 12 hours
 - Food Service Manager 10 hours
 - Food Service Staff 6 hours
 - Part-time Staff 4 hours

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How You Can Prepare for the Admin Review

General Program Compliance

- Water
 - Available for Breakfast AND Lunch?
- Food safety
 - Do we have a food safety plan (HACCP)?
 - · Have staff reviewed the plan?
 - Do we take temperatures and correct if temp is not right?
 - Have we had 2 health inspections per year?

How You Can Prepare for the Admin Review

Other Federal Programs

- Afterschool Snack Program
 - · Offsite OR Onsite review
- Seamless Summer Option
 - Onsite review the same year of a school lunch review
- · Fresh Fruit and Vegetable Program
 - Onsite review
- Special Milk Program
 - Offsite OR Onsite review

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Administrative Review Guidance & Tools

http://doe.sd.gov/cans/nslp.aspx

http://www.fns.usda.gov/schoolmeals/administrative-review-manual

SCHOOL NUTRITION PROGRAM FOR BUSINESS MANAGERS 101

Some Basic Reminders

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General Reminders

- Restricted Food Service Account
 - All revenue that goes into the account must be allowable
 - Moving reimbursement from FS account into another account is not allowable in most cases
 - For example: Afterschool snack reimbursement is received in FS Account and then paid to another account for 21st Century payment = Not Allowed!
- Allowable/unallowable costs
- Procurement:
 - Using the Most Restrictive of Federal, State, and Local rules

Definition of Nonprofit School Food Service Account

Nonprofit school food service account means the restricted account in which all of the revenue from all food service operations conducted by the school food authority principally for the benefit of school children is retained and used only for the operation or improvement of the nonprofit school food service. This account shall include, as appropriate, non-Federal funds used to support student paid lunch prices, and proceeds from nonprogram foods.

7 CFR 210.2 and 210.14

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Paid Lunch Equity (PLE Tool)

- Must be completed every year
- The tool for SY17-18 is posted on the CANS NSLP website
- If you meet specific criteria, you can apply for a waiver this year

Adult Meal Prices...Why are they higher?

- · Schools do not get reimbursed for adult meals
- They are nonprogram foods
- Adult portions should reflect the same portions as student meals (high school serving size)
- A simple calculation to figure out the lowest adult meal charge: Your Free Rate of Reimbursement + Federal Performance Rate of Reimbursement + Value Of USDA Foods (commodity value)

\$3.18 + \$0.06 + \$0.23 = \$3.47

NonProgram Food Revenue Tool FOOD AND NUTRITION SERVICE iter the cost for reimbursable meal, cost of nonprogram food and total revenue ost for Reimbursable Meal Lood otal Nongrogram Lood Revenue Total Revenue finimum portion of revenue from nonprogram funds Minimum Revenue Required from the Sale of Nonprogram Foods

Need to Know

- · Cost of Reimbursable Meal Food
- Cost of Nonprogram Food
- Total Food Cost
- Total Nonprogram Food Revenue
- Total Revenue

NonProgram Food Revenue Tool

- What are nonprogram foods?
 - Adult meals, extra milk, seconds, and any food that is paid for out of the school food service account that is not a reimbursable meal
- How to fill out the tool:
 - Enter information into the peach/tan colored boxes
 - Use the prior school year information or a reference period for an estimate
- What the tool does:
 - Determines whether or not your school is charging enough for nonprogram foods

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Requirements of Nonprogram Foods Revenue

Formula:

Total Program Revenue

Total Program Revenue

>

Total Food Costs
Total Food Costs

Calculate Average Meal Cost

- How much does it cost, on average, to produce a meal in your school district?
- Determine the raw food cost of the item offered for sale.
- Identify the desired food-cost percentage for the school nutrition program operation.
- To establish a base selling price, divide the item's food cost by the desired food cost percentage mark-up.

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Revenue Requirement Calculation Example

Cost for Reimbursable (Program) Food: \$45,000
Cost of Nonprogram Food: \$5,000
Total Food Costs: \$50,000
Total Revenue: \$100,000

By math: Your Total Nonprogram Food Revenue: \$5,000

This example shows the SFA is \$5,000 dollars short of Nonprogram Food Revenue to meet minimum requirement

Unpaid Meal Requirements

- Each district must have a written and communicated policy in place by July 1, 2017
- Required to have a policy or standard procedures on how zero and negative balances (unpaid meal charges) are handled by the SFA
- Must be provided to all households at the start of the SY and to transferring households
- USDA Unpaid Meal Charges website: https://www.fns.usda.gov/school-meals/unpaid-meal-charges

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Unpaid Meal Charges Example

"Elementary students will be allowed to charge the value of up to 5 lunch meals to their account except for the last two weeks of school when no charging is allowed. After the student reaches a negative balance equivalent to 5 lunch meals, a hot meal will no longer be served and the student will be provided an alternative meal until the account has a positive balance. Once a student has \$5.00 remaining in his or her account, a low balance notification will be sent home with the student. This low balance notification will continue to be sent home daily until the account is more than \$5.00 positive. Parents also may sign up to receive electronic notification of low balances via the online school lunch payment system."

Unpaid Meal Charges Example

Middle school students is the same as elementary except they are told discretely while going through line and given a note to take home.

High school students is similar however once they have reached negative 5 meals they are no longer served unless they want to pay in cash.

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MAXIMIZING YOUR ENTITLEMENT DOLLARS

Commodities/USDA Foods

USDA Foods Entitlement Usage

- How is entitlement determined?
 - The total lunches served (TLS) in the prior completed school year multiplied by a planned assistance level (PAL) set each year in July based on certain indexes set by Congress in the original act
 - TLS X PAL = Entitlement

USDA Foods Entitlement Usage

How can Entitlement be spent?

- Each year, by March, surveys are open on iCAN for agencies to allocate how they want the state agency to purchase USDA Foods
 - Survey types are for:
 - Direct Delivery (brown box) to South Dakota's warehouse
 - FFAVORS USDA Foods Fresh DoD
 - Processor Delivery (Bulk to Processor)
 - Net Off Invoice (NOI)

USDA Foods Entitlement Usage

Direct Delivery (brown box) to South Dakota's warehouse

- Frozen 40 pound box or smaller
- Number 10 can or smaller
- Refrigerated 40 pound container or smaller

Processor Delivery (Bulk to Processor)

USDA Foods Entitlement Usage

FFAVORS - USDA Foods Fresh DoD

- USDA Foods entitlement funds set aside for fresh fruits and vegetables purchases
 - Agencies log into the DoD FFAVORS website and place orders for weekly or bi-weekly deliveries through the contracted distributor
 - Currently the South Dakota FFAVORS contract is with CashWa Distributing

USDA Foods Entitlement Usage

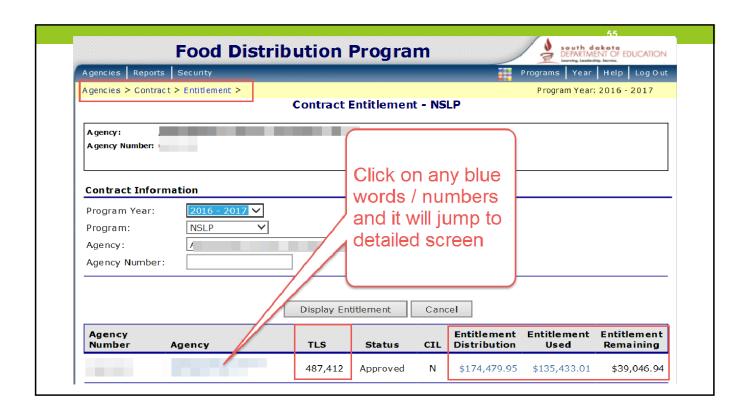
Net Off Invoice (NOI)

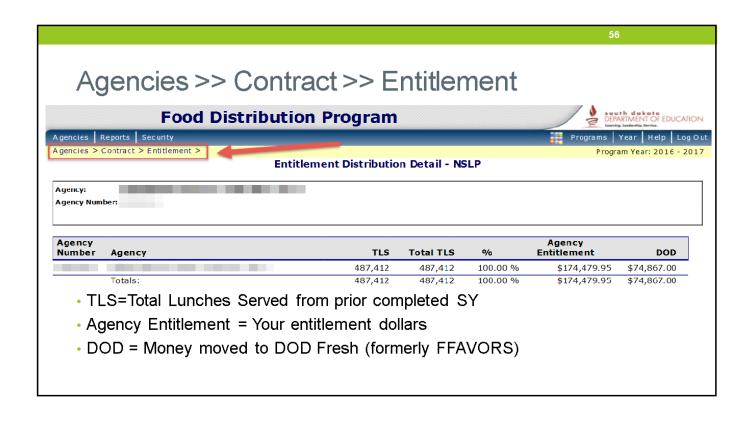
- A few schools in South Dakota have asked to procure their own processing items through distributors
 - Additional training is required for new agencies
- Purchases are tracked from the processor to the agency storeroom and monitored through processor supported websites

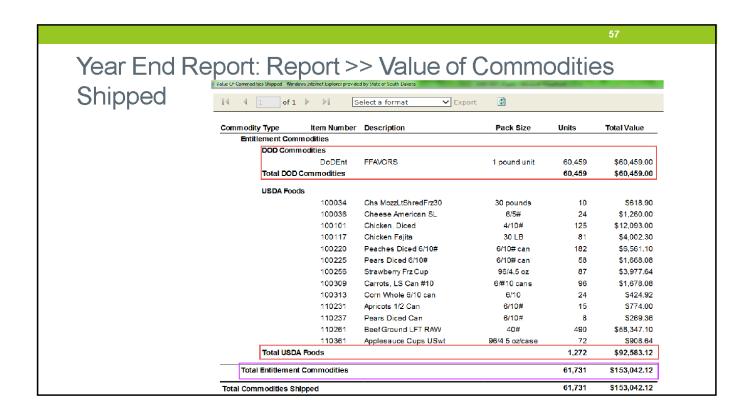
How can a business manager track entitlement?

By accessing iCAN!









HOT TOPICS & DISCUSSION

What's On Your Mind?

Block Grant impact on Pierre

Total paid Lunches for last school year X's .29
Total lunches all categories
Total Breakfast reimbursement all meals
Total USDA foods received last year
\$ 55,296.00
\$ 17,155.00
\$ 48,100.00
\$ 84,711.00

If any summer or other programs FFV total funds

N/A

DISTRICT TOTAL \$205,262.00

Block Grant impact on Brandon Valley

Total paid Lunches for last school year X's .29
Total lunches all categories
Total Breakfast reimbursement all meals
Total USDA foods received last year
\$108,191.00
\$32,820.00
\$87,778.00
\$172,573.00

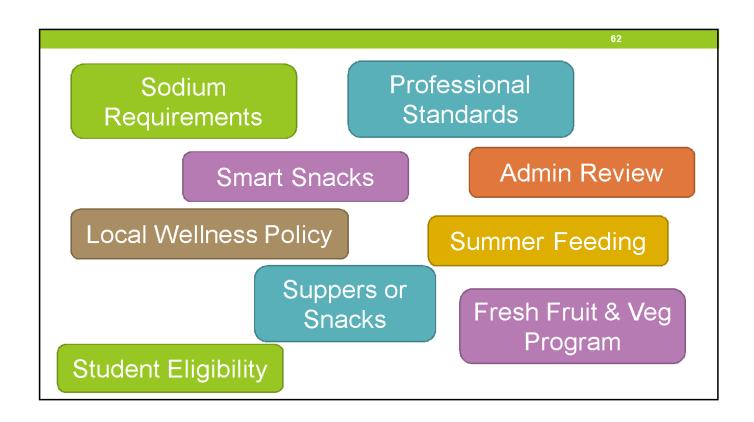
If any summer or other programs FFV total funds

N/A

DISTRICT TOTAL \$401,362.00

Where does the lack of funding get made up?

- The General Fund and this equals fewer dollars spent on education.
- Capped funds
- Does our state have the bandwidth to manage?
- State could determine funds may be allocated differently to schools.
- If more free/red added to district where do funds come from for these new students?
- Natural disasters or major layoffs would significantly impact funding used up faster and again where will the funds be made up?
- We need you to make sure our Senators and Congresswoman know our state can't afford Child Nutrition programs to be Block Grants





Contact Us!

CANS Office

• Email: DOE.SchoolLunch@state.sd.us

• Phone: 605-773-3413

School Nutrition Association of SD

http://www.snasd.org/

This institution is an equal opportunity provider.